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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Eastern Industries, LLC, a New York
limited liability company,

Plaintiff,

vs.

EarthCo Enterprises, LLC, an Arizona
limited liability company; Thomas Vella
and Jane Doe Vella, husband and wife,
Wesley Zlotoff and Jane Doe Zlotoff,
husband and wife; Dominic Riccobono
and Jane Doe Riccobano, husband and
wife, and Jack Thomas Riccobono and
Jane Roe Riccobono, husband and wife,
Scott Williams and Jane Doe Williams,
husband and wife,

Defendants.

Case No.: 2:23-cv-00109

**STIPULATION TO EXTEND
DEADLINES**

(Fifth Request)

(Assigned to the Honorable Susan M.
Brnovich)

Through undersigned counsel and pursuant to Rule 7.3 of the Local Rules of Civil Procedure, the parties hereby stipulate and agree to extend the remaining deadlines by approximately sixty days each, all in accordance with the [Proposed] Order attached hereto.

Good cause exists for such an extension. Though the parties have remained in constant communication, and though it was neither their intention nor their wish to extend dates again or cause additional delay, scheduling conflicts have nevertheless arisen on both sides as a result of busy caseloads and illnesses that have delayed the progress of discovery.

1 Accordingly, the parties stipulate and agree to extend the following dates and
2 deadlines as follows:

3 1. The last day to complete fact discovery, from August 29, 2025 to **October**
4 **28, 2025;**
5

6 2. The last day to file dispositive motions, from October 29, 2025 to **December**
7 **29, 2025;**
8

9 3. The Telephonic Trial Setting Conference, from November 12, 2025 at 9:00
10 a.m. to a date and time approximately sixty days later to be set by the Court.
11

12 **RESPECTFULLY SUBMITTED** this 27th day of August 2025.
13

14 **MILLS + WOODS LAW, PLLC**

15
16 By /s/ Sean A. Woods
17 Robert T. Mills
18 Sean A. Woods
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19 **WARNER ANGLE HALLAM JACKSON &**
20 **FORMANEK PLC**

21
22 By /s/ Peter J. Foster (w/ permission)
23 Sandra E. Portney
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CERTIFICATE OF SERVICE

I hereby certify that on August 27, 2025, I electronically transmitted the foregoing document to the following via the Court's ECF filing system:

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